



Clean Harbors Environmental Services, Inc.
2247 South Highway 71
Kimball, Nebraska 69145
308.235.4012
www.cleanharbors.com

Sent via FedEx

August 7, 2013

Mr. Michael J. Martin
U.S. Environmental Protection Agency, Region VII
Environmental Services Division
300 Minnesota Avenue
Kansas City, KS 66101

Re: July 30 – July 31, 2013 Inspection
EPA ID Number: NED981723513

Dear Mr. Martin;

The purpose of this letter is to respond to the Notice of Violation dated July 31, 2013 (see Attachment One). Those violations are listed below followed by the Clean Harbors Environmental Services, Inc. (CHESI) response.

Violation 1 – Permit Condition III.I.3. – Adequate aisle space not maintained at Area 25 (aisle 31).

CHESI Response: Action to correct aisle spacing in Aisle 31 of Area 25 was taken July 30, 2013 during the EPA inspection. Please see Attachment Two.

Violation 2 – Permit Condition III.J.1. – The base of the containment system not free of gaps.

CHESI Response: CHESI submitted Work Orders to its Maintenance Department while EPA Inspectors were on site. The Work Orders were for secondary containment coating repairs for the gaps found in Area 95 and Area 25. Please see Attachment Three for the pictures of the corrections and Attachment Four for the completed internal Work Orders.

Should you have any questions please feel free to contact the CHESI Compliance Manager, Jessica Grow, at 308-235-8260 or by email at grow.jessica@cleanharbors.com.

Sincerely,

A handwritten signature in black ink that reads "Jared Hunsaker".

Jared Hunsaker
Facility General Manager
hunsakerj@cleanharbors.com

AWMD / WEMM
AUG 16 2013
RECEIVED

ATTACHMENT 1
COPY OF NOTICE OF VIOLATION JULY 31, 2013

Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: Clean Harbors Environmental Services Inc.
Address: 2247 South Highway 71
Kimball, NE 69145
EPA ID Number: NED981723513 Date: 07/31/2013

This notice is provided to call your attention to the following areas of noncompliance with state and federal regulations. This notice does not constitute a compliance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA and may not be a complete listing of all violations resulting from the the inspection.

<u>Citation</u>	<u>Description of Violation</u>
1) Permit Condition III. I. 3.	Adequate aisle space not maintained at Area 25 (aisle 31).
2) Permit Condition III. J. 1.	The base of the containment system not free of gaps. (A) Area 25 - one 1/2 foot gap on Aisle 31 (B) Area 95 - one 3 foot gap at Grid 34 and one 1 foot gap at Grid 34

You are requested to submit a written response within 14 calendar days of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U. S. Environmental Protection Agency, Region VII
Environmental Services Division
300 Minnesota Avenue
Kansas City, KS 66101
ATTN: Michael J. Martin

If you have any questions about this Notice or wish to discuss your response, you may call me at
(913) 551-7149, or Edon Buckner (Compliance Officer) at
(913) 551-7621.

This Notice prepared by Michael J. Martin Date: 07/31/2013

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: JARED HUNSAKER Date: 7/31/2013
Signature: Jared Hunsaeker
Title: General Manager

ATTACHMENT 2
PERMIT CONDITION III.I.3. CORRECTIVE ACTION PICTURES

Permit Condition III.1.3

Area 25 Aisle Spacing

Before



After



ATTACHMENT 3
PERMIT CONDITION III.J.1. CORRECTIVE ACTION PICTURES

Permit Condition III.J.1.(a)

Area 25 – one ½ foot gap on aisle 31 Before



Permit Condition III.J.1.(a)

Area 25 – one ½ foot gap on aisle 31 After



Permit Condition III.J.1 (b)

Area 95 – one 3 foot gap at Grid 34 and one foot gap
at grid 34 Before Coating Repair



Permit Condition III.J.1. (b)

Area 95 Gaps After Coating Repair



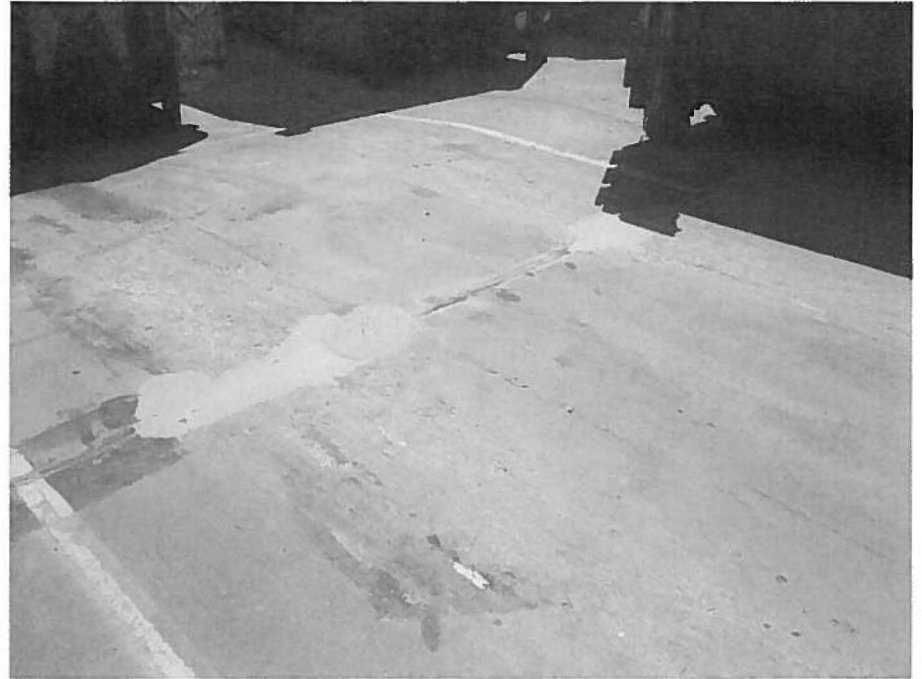
Permit Condition III.J.1. (b)

Area 95 Gaps After Coating Repair

Slot 34 - After



Slot 35 - After



ATTACHMENT 4
PERMIT CONDITION III.J.1. CORRECTIVE ACTION WORK ORDERS

WORK ORDER
Page: 1
CLEAN HARBORS - KIMBALL, NE

WO: 027691 **Account:** **Project:** **Status:** F

Submitted By:	MIKE SIDELL	Phone:	
Contact:		Phone:	
Date,Time:	08/01/13,11:47	Required:	08/02/13
Type:	R	Dispatched To:	
Priority:	2	Rating:	8
Failure:		Action:	
Est Down:		Downtime:	
OS Date,Time:		RS Date,Time:	
Charge Code:	COM-L	COMPLIANCE LABOR	
Safety Procs:		PM Desc:	

EQUIPMENT INFORMATION

Equipment:	BLDG-25	STORAGE PAD
Eqp Hier:	BLDG-25	Serial #:
Location:		Model #:
Keyword:	BUILDING-25, ALL BUILDINGS IN AREA 25	Manufacturer:

PROBLEM DESCRIPTION

Repairs completed 8/1/2013. CC25-ROW30 west aisle, 1/4 way down the row from the south end heading north.

COMMENTS

Prepped and cleaned joint. Installed joint sealant.

AUTHORIZATION/COMPLETION INFORMATION

Authorized By:	Ken Redding	Authorized:	08/01/13
Planned By:		Planned:	
Completed By:	Maintenance	Completed:	08/01/13





WORK ORDER REPRINT

Page: 1

CLEAN HARBORS - KIMBALL, NE

WO: 027681 **Account:** **Project:** **Status:** F

Submitted By:	MIKE SIDELL	Phone:	
Contact:		Phone:	
Date,Time:	07/30/13,14:39	Required:	07/31/13
Type:	R	Dispatched To:	
Priority:	2	Rating:	8
Failure:		Action:	
Est Down:		Downtime:	
OS Date,Time:		RS Date,Time:	
Charge Code:	REPAIR-L	REPAIR LABOR	
Safety Procs:		PM Desc:	

EQUIPMENT INFORMATION

Equipment:	BLDG-95	STORAGE PAD
Eqp Hier:	BLDG-95	Serial #:
Location:	ROLL-OFF STORAGE	Model #:
Keyword:	BUILDING-95, ALL BUILDINGS IN AREA 95	Manufacturer:

PROBLEM DESCRIPTION

95-34, Please repair all cracks and seams

COMMENTS

Prepped and cleaned joints. Installed joint sealant.

AUTHORIZATION/COMPLETION INFORMATION

Authorized By:	Ken Redding	Authorized:	07/31/13
Planned By:		Planned:	
Completed By:	Maintenance	Completed:	08/01/13









WORK ORDER REPRINT

Page: 1

CLEAN HARBORS - KIMBALL, NE

WO: 027682 **Account:** **Project:** **Status:** F

Submitted By:	MIKE SIDELL	Phone:	
Contact:		Phone:	
Date,Time:	07/30/13,14:40	Required:	07/31/13
Type:	R	Dispatched To:	
Priority:	2	Rating:	8
Failure:		Action:	
Est Down:		Downtime:	
OS Date,Time:		RS Date,Time:	
Charge Code:	REPAIR-L	REPAIR LABOR	
Safety Procs:		PM Desc:	

EQUIPMENT INFORMATION

Equipment:	BLDG-95	STORAGE PAD
Eqp Hier:	BLDG-95	Serial #:
Location:	ROLL-OFF STORAGE	Model #:
Keyword:	BUILDING-95, ALL BUILDINGS IN AREA 95	Manufacturer:

PROBLEM DESCRIPTION

95-35, Please repair all cracks and seams

COMMENTS

Prepped and cleaned joint. Installed joint sealant.

AUTHORIZATION/COMPLETION INFORMATION

Authorized By:	Ken Redding	Authorized:	07/31/13
Planned By:		Planned:	
Completed By:	Maintenance	Completed:	08/01/13

